

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

STEVEN BAILEY

Plaintiff,

vs.

CITY OF CHICAGO, and Chicago Police
Officers H. Rodriguez, Star No. 17679,
and O. Velazquez, Star No. 8936,
Individually,

Defendants.

Case No. 07 C 6756

Judge Bucklo

Magistrate Judge Soat Brown

JURY DEMANDED

**DEFENDANTS' JOINT AGREED MOTION FOR LEAVE TO FILE
JOINT ANSWER, *IN STANTER***

Defendants, by one of their attorneys, Christopher A. Wallace, respectfully move the Court for leave to file their joint answer, *in stanter*. In support of their motion, Defendants state as follows:

1. The parties have met and conferred in this matter and have proposed a discovery plan in accordance with this Court's standing orders, the district's local rules and in compliance with the Federal Rules of Civil Procedure.
2. On February 29, 2008, the parties appeared before the Court and the parties' proposed discovery plan was entered. (*See* Docket Entry No. 9).
3. A copy of Defendants' joint answer is attached hereto as Exhibit A.
4. Counsel for defendants spoke with counsel for plaintiff, Garrett Browne, prior to the filing of the instant motion wherein counsel for plaintiff agreed to the motion.
5. Defendants seek leave of Court to file their answer to plaintiff's complaint to facilitate the just, speedy and efficient resolution of this matter. No prejudice to either

party's case will result in granting Defendants' motion and no delay in the procession of discovery will ensue.

WHEREFORE, Defendants respectfully request this Court grant the instant motion and give leave to Defendants to file their joint answer.

DATED: March 10, 2008

Respectfully submitted,

City of Chicago
Mara S. Georges
Corporation Counsel

By: /s/ Christopher A. Wallace
Christopher A. Wallace
Assistant Corporation Counsel
Attorney for Defendant City of Chicago

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Officer Rodriguez
Officer Velasquez

By: /s/ Christopher A. Wallace
Christopher A. Wallace
Assistant Corporation Counsel
Attorney for Individual Defendants

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CERTIFICATE OF SERVICE

I, Christopher Wallace, hereby certify that on March 10, 2008, I caused a copy of the foregoing Joint Agreed Motion to be served upon all counsel of record by filing the same before the Court via the Court's ECF system.

/s/ Christopher Wallace
Christopher Wallace